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May 23, 2002 OFFICE OF THE
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: BellSouth Telecommunications, Inc. Entry into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996
Docket No. 97-00309

Dear David:

Please find attached the original and thirteen copies of the Consolidated CLEC
First Data Request to BellSouth Telecommunications, Inc. which we would appreciate your
filing in the above-captioned proceeding.

Thank you for your attention to this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/th
Attachment

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: *BellSouth Telecommunications, Inc.'s*)
Entry Into Long Distance (InterLATA))
Service in Tennessee Pursuant to Section)
271 of the Telecommunications Act of 1996)

Docket No. 97-00309

**CONSOLIDATED CLEC FIRST DATA REQUEST TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

The Southeastern Competitive Carriers Association ("SECCA"); AT&T Communications of the South Central States, LLC. ("AT&T"), TCG MidSouth, Inc.; MCI WorldCom Communications, Inc., MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. (collectively "WorldCom"); XO Tennessee, Inc. ("XO"); and DIECA d/b/a Covad Communications Company ("Covad") serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before June 13, 2002.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. Where an Interrogatory calls for an answer that involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.

4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.
5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing;

the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means BellSouth and any agents or employees thereof.

11. The "Georgia OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission ("GPSC") in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS

Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.

12. The “Florida OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission (“FPSC”) in Docket Nos. 981834-TP and 960786-TL.

13. “Status Report” refers to any KCI Interim Status Reports.

14. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your

response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Please identify the individual who is best able to provide information on the existence and extent of competition for local service in Tennessee.

ANSWER:

INTERROGATORY No. 3: Please provide supplemental responses to covering the period July 1, 2001 to April 30, 2002, to Interrogatories Nos. 5, 6, 16, 17, and 18, from AT&T, SECCA, Brooks Fiber, MCImetro, WorldCom, Time Warner, XO Tennessee, and Covad which were served on August 21, 2001.

INTERROGATORY No. 4: Please provide supplemental responses covering the period October 1, 2001 to April 30, 2002, to Interrogatories Nos. 22, 23, 69, and 87, from AT&T, SECCA, Brooks Fiber, MCImetro, WorldCom, Time Warner, XO Tennessee, and Covad which were served on August 21, 2001.

INTERROGATORY No. 5: For the year 2001, provide the total number of BellSouth's Tennessee:

- A. Local minutes
- B. Local calls
- C. IntraLATA toll minutes
- D. IntraLATA toll calls
- E. InterLATA access minutes
- F. InterLATA access calls

ANSWER:

INTERROGATORY No. 6: For the most recent six-month period, please provide BellSouth's monthly wholesale revenues on a Tennessee-specific and regional basis for each of the following:

- A. Residential resale;
- B. Business resale;

- C. Unbundled network elements; and
- D. Interconnection

ANSWER:

INTERROGATORY No. 7: From the time period July 2001 to the present, please describe:

1. How many separate times BellSouth disconnected interconnection trunks in Tennessee and each of the other states in BellSouth's region. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
2. In what specific locations did BellSouth disconnect interconnection trunks in Tennessee and each of the other states in BellSouth's region;
3. In the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur;
4. In how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?
5. What method of communication does BellSouth utilize to communicate such disconnect activities to AT&T?

ANSWER:

INTERROGATORY No. 8: Describe the process used by BellSouth for determining the date when BellSouth begins charging CLECs for power usage.

(a) Do these charges begin at the time that power is drained by the CLEC or when the CLEC accepts the collocation cage?

(b) Please identify, by collocation site, the actual power drain incurred by AT&T and the corresponding feeder fuse size placed, as follows:

<i>S I T E - X</i>	<i>Actual Drain</i>	<i>Fused Ampere</i>
When Power Charges begin (date)		
At 3 months after cage acceptance		
At 6 months after cage acceptance		
At 1 year after cage acceptance		
At 18 months after cage acceptance		

ANSWER:

INTERROGATORY No. 9: Identify the members of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of change requests under the Change Control process Document. This should include but not be limited to the groups known as the "Triage Committee", the "Change Review Board", the "Directors Committee", the "Release Prioritization Team", the "Third Party Testing Team", the "Regulatory Team" the LCSD Team", the Project Managers", the "BellSouth IT Team", and "BTSP".

ANSWER:

INTERROGATORY No. 10: Bellsouth states in a May 14, 2002 Ex Parte, in FCC Docket No. 02-35, "Assuming no industry release in calendar year 2003, the CLECs could see at least 80% of the existing change request backlog eliminated." Please provide all documentation and analysis that supports that statement, including each change request, by change request number, that BellSouth used in its analysis.

ANSWER:

INTERROGATORY No. 11: BellSouth states in a May 14, 2002 Ex Parte, in FCC Docket No. 02-35, "Finally, in clarifying the nature of "new" change requests, we explained how requests that BellSouth had rejected remained in that category because the requesting CLEC choose neither to use the dispute resolution process incorporated in the CCP nor to withdraw its request." Please list and produce supporting documentation referred to in this statement, that is, those change requests in the "new" category that have been rejected by BellSouth as of May 14, 2002.

ANSWER:

INTERROGATORY No. 12: On April 26, 2002, BellSouth published Change Request CR0756, entitled "UNE-P Call Scope Changes" labeling it as a Type-2, "Regulatory Mandate". The User Requirements Document (ENC21046.DOC Version 6.0) describes the Current Process as follows "Currently, when converting Retail/Resale to UNE-P, the correct LNECLSSVC is not always populated on the conversion.", and the Expected Process as follows "With implementation of this feature, conversions from Retail/Resale line to UNE-P will result in the correct LNECLSSCV being populated." Please explain BellSouth's classification of this defect as a regulatory mandate and provide the specific regulatory

order(s) that addresses the incorrect conversion of lines from Retail/Resale to UNE-P that are the subject of this change request for TN and all other BellSouth states.

ANSWER:

INTERROGATORY No. 13: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both.

The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center (d) regional central office operations; (e) regional installation and maintenance operations; (f) regional engineering and construction operations; (g) work management centers; (h) network reliability center; (i) address/facility inventory group (j) circuit provisioning group (k) customer wholesale interconnection services (CWINS) center; (l) billing data centers (m) Access Customer Advocacy Center (ACAC); (n) Interexchange Carrier Service Center (ICSC); (o) Local Interconnection Service Center (LISC).

ANSWER:

INTERROGATORY No. 14: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

ANSWER:

INTERROGATORY No. 15: Please identify all modifications to BellSouth's systems, processes, and procedures necessary to collect and present data in reports that will comply with the permanent set of performance measurements adopted by the Tennessee regulatory Authority in Docket No. 01-00193 and

- (a) provide a detailed schedule for completing each modification listed;
- (b) describe the recourses necessary to complete each modification listed; and
- (c) if any listed modifications cannot be completed within 30 days, please state the reason(s) for the delay in completing that modification.

ANSWER:

INTERROGATORY No. 16: Provide a complete description of each Performance Metrics defect correction and feature enhancement scheduled for implementation in Test Director, Team Connection or other Performance Metrics tracking systems.

ANSWER:

INTERROGATORY No. 17: Provide a complete description of each Performance Metrics defect correction and feature enhancement implemented from October 2001 to the present and tracked in Test Director, Team Connection or other Performance Metrics tracking system.

ANSWER:

INTERROGATORY No. 18: Provide copies of all meeting minutes from October 2001 to the present of the Performance Metrics Production Change Control Board described in Exception 119 of the Florida Third Party Test.

ANSWER:

INTERROGATORY No. 19: Provide BellSouth tracking or other issues logs for open issues, observations and exceptions in the current performance metrics audit in Georgia.

ANSWER:

INTERROGATORY No. 20: Provide BellSouth's Network Services Dispatch Priority List associated with maintenance activities. This list should detail how BellSouth prioritizes all CLEC trouble tickets.

ANSWER:

INTERROGATORY No. 21: Provide the date by which completion notices for orders completed in one month, but notice provided in another will be added to the Average Completion Notice Interval Measure.

ANSWER:

INTERROGATORY No. 22: Provide the date by which completion notices for orders classified, as "projects" will be added to the Average Completion Notice Interval Measure.

ANSWER:

INTERROGATORY No. 23: Provide the date by which BellSouth will report performance for the Average Jeopardy Notice Interval Measure in compliance with its published business rules which require that BellSouth measure from the date and time the notice is released to the CLEC until 5pm on the commitment date of the order.

ANSWER:

INTERROGATORY No. 24: Provide BellSouth's sampling methodology for the % Database Update Accuracy Measure.

ANSWER:

INTERROGATORY No. 25: Describe in which performance measures BellSouth reports its rejection and FOC performance for each type of LSR submitted to the Complex Resale Support Group (CRSG).

ANSWER:

INTERROGATORY No. 26: Please provide BellSouth's rejection and FOC performance for LSRs processed by the Complex Resale Support Group (CRSG) for Tennessee for the months of January-April, 2002.

ANSWER:

INTERROGATORY No. 27: Describe why BellSouth populates the equity column in its (Monthly State Summary (MSS) performance reports with "Yes" for the Mean Held Orders Interval Measure even though there are no CLEC held orders.

ANSWER:

INTERROGATORY No. 28: Does BellSouth exclude outages of less than 20 minutes from the Interface Availability Measure? If yes, provide, by month and by interface, for the months of January-April 2002, the number of outages of less than 20 minutes.

ANSWER:

INTERROGATORY No. 29: Describe any differences in the data included in the LSRs in the denominator of the % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the flow-through report.

ANSWER:

INTERROGATORY No. 30: Describe any differences in the data included in the LSRs in the denominator of the LNP % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the LNP flow-through report.

ANSWER:

INTERROGATORY No. 31: Describe any differences in the data included in the LSRs in the fully mechanized Reject Interval measure and the LSRs in the auto-clarifications of the flow-through report.

ANSWER:

INTERROGATORY No. 32: Describe any differences in the data included in the LSRs in the fully mechanized LNP Reject Interval measure and the LSRs in the auto-clarifications of the LNP flow-through report.

ANSWER:

INTERROGATORY No. 33: Describe any differences in the data included in the LSRs in the partially mechanized Reject Interval measure and the LSRs included in the "CLEC caused fallout" of the flow-through report.

ANSWER:

INTERROGATORY No. 34: Describe any differences in the data included in the LSRs in the partially mechanized LNP Reject Interval measure and the LSRs included in the “CLEC caused fallout” of the LNP flow-through report.

ANSWER:

INTERROGATORY No. 35: Describe any differences in the data included in the LSRs in the fully mechanized FOC timeliness measure and the LSRs included in the “Issued Service Orders” of the flow-through report.

ANSWER:

INTERROGATORY No. 36: Describe any differences in the data included in the LSRs in the fully mechanized LNP FOC timeliness measure and the LSRs included in the “Issued Service Orders” of the LNP flow-through report.

ANSWER:

INTERROGATORY No. 37: Describe any differences in the completed orders used in the calculation of the missed appointments measure and the completed orders used in the denominator of the Average Completion Notice Interval Measure.

ANSWER:

INTERROGATORY No. 38: Describe BellSouth’s policy on providing raw data for LSRs that are documented exclusions from performance measures. For example, LSRs classified as

“projects” are documented exclusions from the Reject Interval and FOC Timeliness measures.

BellSouth currently refuses to provide raw data for these “project” LSRs.

ANSWER:

INTERROGATORY No. 39: Describe any differences in the data included in the LSRs in the denominator of the Acknowledgement Message Completeness measure and the number of LSRs included in the “Total Mech LSRs” in the Flow Through Report and LNP Flow Through Report.

ANSWER:

INTERROGATORY No. 40: Does BellSouth have internal criteria that it uses to evaluate the performance of the CLEC Care Organization, both individually and collectively? If so, please specify such criteria in detail.

ANSWER:

INTERROGATORY No. 41: How does BellSouth structure its compensation plan for CLEC Care Associates?

ANSWER:

INTERROGATORY No. 42: In what areas of expertise are CLEC Care Organization Associates trained? Please provide a detailed description.

ANSWER:

INTERROGATORY No. 43: From January 2002 to April 2002, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the achieved flow through rate and the CLEC error excluded flow through rate, by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a) LNP;
- b) UNE;
- c) Business Resale;
- d) Residence Resale; and
- e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

ANSWER:

INTERROGATORY No. 44: From January 2002 to April 2002, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the volume of LSRs (segregated by manual and electronic) and the volume of issued service orders by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a. LNP;
- b. UNE;
- c. Business Resale;
- d. Residence Resale; and
- e. Total (i.e., UNE, Business Resale, and Residential Resale combined)

INTERROGATORY No. 45: For each month since January 2002 to April 2002, please provide BellSouth's monthly wholesale revenues (or billings) for each state in its nine state region (and its regional total) in each of the following areas: residential resale, business resale, unbundled network elements, and interconnection. Also, please describe BellSouth's understanding of the reasons causing any significant change (i.e., 15 percent or greater) in Tennessee from one month to another (e.g., January 2002 to February, 2002) in any area.

ANSWER:

INTERROGATORY No. 46: Please describe BellSouth's current plans to replace existing OSS with different OSS solutions, including but not limited to the anticipated technology to be used, functionality, and implementation schedule.

ANSWER:

INTERROGATORY No. 47: Identify the OSS performance measures that relate to: (a) testing of advanced services; and (b) the resale of advance services.

ANSWER:

INTERROGATORY No. 48: Please describe in detail the process BellSouth uses to migrate a customer from Bellsouth to a CLEC when the CLEC requests the migration "as specified" in an order for UNE-P service. Please include in your description of an explanation

of all internal Bellsouth orders (such as "D" orders and "N" orders or the single "C" order) used to facilitate the migration and the provisioning systems those orders flow through.

ANSWER:

INTERROGATORY No. 49: If an electronic UNE-P migration LSR as specified falls out for manual processing, does the BellSouth service representative use the service address provided on the CLEC LSR to create the "D" and the "N" order or the "single "C" order? If not, from what database or system does the representative obtain the service address for the "D" order, for the "N" order or for the single "C" order?

ANSWER:

INTERROGATORY No. 50: Since BellSouth's implementation of the "single 'C'" order, some AT&T customers have lost dial tone at the time of conversion. Please describe the implementation process of the "single 'C'" and provide explanation of why a customer would lose dial tone.

ANSWER:

INTERROGATORY No. 51: How is the LMOS database updated to reflect migration of a BellSouth retail customer to a CLEC serving the customer via UNE-P? If the "N" order falls into a hold file, is the update to the database delayed? If the "N" and the "D" order complete

separately, how does that affect the manner in which trouble tickets are handled in the LMOS database?

ANSWER:

INTERROGATORY No. 52: What is the complete list of functions for wholesale provisioning of line sharing and what are the associated task times?

ANSWER:

INTERROGATORY No. 53: What efforts, if any, is BellSouth undertaking to lower the provisioning interval of lines shared loops? Please provide any and all documents containing information which supporting your response.

ANSWER:

INTERROGATORY No. 54: What process does BellSouth use to track and inventory to assignments to customer facilities located in CLEC collocation cages?

ANSWER:

INTERROGATORY No. 55: In BellSouth documentation, BellSouth's maintenance priorities are listed as emergency customers first and regular maintenance priorities next.

What are Bellsouth's regular maintenance priorities and in what order are the troubles

associated with each type of customer service platform, e.g., UNE-Loop, UNE-Platform, DS1, resale, etc., handled?

ANSWER:

INTERROGATORY No. 56: What process does BellSouth use to insure that all CLEC disconnect orders are worked and that billing has ceased for the associated facilities/services?

ANSWER:

INTERROGATORY No. 57: What process does BellSouth use for handling trouble reports filed by CLECs on the same day as the transition of service is performed?

ANSWER:

INTERROGATORY No. 58: What prevents BellSouth performing a database facilities check prior to returning a firm order commitment to CLECs in states other than Florida?

ANSWER:

INTERROGATORY No. 59: Under what circumstances does BellSouth require a dispatch for the maintenance of a UNE-P customer and what rates are applicable to such dispatch?

ANSWER:

INTERROGATORY No. 60: State whether you contend that cageless physical collocation may not be provisioned in a shorter interval than caged physical collocation. If so, state each and every fact that supports your position.

ANSWER:

INTERROGATORY No. 61: State what federal universal service funds have been received by BellSouth during the last twelve months. Of the funds received, what has been spent or is designated to be spent for facilities that support or use BellSouth's retail DSL service?

ANSWER:

INTERROGATORY No. 62: How many CLEC customers have been rejected for DSL service because a loop needed to be conditioned? Of those rejected, how many of the customers were able to get DSL service because BellSouth located another loop for them that did not require conditioning?

ANSWER:

INTERROGATORY No. 63: Where has BellSouth deployed xDSL?

ANSWER:

INTERROGATORY No. 64: What are the task times/functions required to provision a stand-alone loop for a CLEC?

ANSWER:

INTERROGATORY No. 65: What percentage of the time does BellSouth meet its cooperative acceptance testing (with coordinated installation) commitments on time for CLECs? To the extent that BellSouth performs an acceptance testing process for its retail customers, what percentage of the time does BellSouth meet its retail testing commitments?

ANSWER:

INTERROGATORY No. 66: What is BellSouth's process for tracking and inventorying specific information regarding the customer's to which it has circuit facilities (CFAs) assigned?

ANSWER:

INTERROGATORY No. 67: What are BellSouth's plans for CLECs ordering of high capacity UNEs (e.g., DS1 Loop or EEL – DS1 Loop + DS1 Interoffice Transport)?

- a) If a mechanized Local Service Request process is in BellSouth's plans, will BellSouth require all CLECs to invest in a new LSR Process and/or will BellSouth allow a CLEC to continue to utilize ACMS to order high capacity UNEs (and EELs) under its Interconnection Agreements?

ANSWER:

INTERROGATORY No. 68: Please describe in detail how a "line loss" notification is generated and what systems are involved in its generation.

ANSWER:

INTERROGATORY No. 69: Please describe the exact "triggering event" or "triggering events" for a line loss notification.

ANSWER:

INTERROGATORY No. 70: Please describe the processes and systems used to post line loss notifications to the website.

ANSWER:

INTERROGATORY No. 71: What event (Service Order Completion, CSR update, etc.) triggers the notification of BellSouth retail that a customer has left and when does this happen (e.g. FOC, SOC)?

ANSWER:

INTERROGATORY No. 72: Please describe in detail the manner in which BellSouth's "winback centers" or other winback personnel are informed that a BellSouth retail customer has left.

ANSWER:

INTERROGATORY No. 73: Is winback literature (e.g. letters to the end user) automatically triggered or is manual intervention required?

ANSWER:

INTERROGATORY No. 74: Please identify all switches in Tennessee that could be impacted by the need to change physical equipment in the central office to provide caller ID. Provide a complete list of NPA/NXX combinations that are included. (Reference correspondence between MCI and BST on CR 0756 for details.)

ANSWER:

INTERROGATORY No. 75: In Carrier Notification No. SN91082231 dated March 12, 2001, you stated that Design Layout Records (DLR) would no longer be available to Tennessee or other CLECs who submit Local Service Requests (LSR) through Electronic Data Interchange (EDI), Telecommunications Access Gateway (TAG) or Local Exchange Navigation System (LENS). In what ways, if any, may Tennessee CLECs that submit LSRs through EDI, TAG or LENS print or view DLRs associated with their orders?

ANSWER:

INTERROGATORY No. 76: If the answer to the previous interrogatory is that there is no way for Tennessee CLECs who submit LSRs through EDI, TAG or LENS to print or view DLRs associated with their orders, has the nonrecurring cost of loops for which DLRs were formally provided been reduced?

ANSWER:

INTERROGATORY No. 77: Identify the person having the most knowledge of the facts set out in response to the previous two Interrogatories, both of which relate to the circumstances under which BellSouth will provide DLRs to Tennessee CLECs who purchase loop types that call for the delivery of this document.

ANSWER:

INTERROGATORY No. 78: What percentage of BellSouth's Remote Terminals in Tennessee are connected to a Central Office via Digital Loop Carrier (DLC)?

ANSWER:

INTERROGATORY No. 79: What percentage of BellSouth's Remote Terminals in Tennessee are connected to a Central Office via both DLC and copper wires?

ANSWER:

INTERROGATORY No. 80: What percentage of BellSouth's Remote Terminals in Tennessee are connected to a Central Office via only DLC and not copper wires?

ANSWER:

INTERROGATORY No. 81: For the categories of Remote Terminals described in the previous three Interrogatories, each of which relates to BellSouth's deployment of various technologies in its Tennessee Remote Terminals, identify any and all documents containing any prediction or projection by BellSouth of future changes in the percentages described in those paragraphs.

ANSWER:

INTERROGATORY No. 82: Identify the person most knowledgeable about the information requested by the previous four Interrogatories, each of which relates to BellSouth's deployment of various technologies in its Tennessee Remote Terminals.

ANSWER:

INTERROGATORY No. 83: In your Petition for Stay of the Tennessee Regulatory Authority's Order dated April 10, 2002, you state that "BellSouth has not deployed dual purpose line cards in its NGDLC systems anywhere in Tennessee or elsewhere in BellSouth's nine-state network." Each of the subparts of this interrogatory relate to this statement:

- a. What percentage of BellSouth's Remote Terminals in Tennessee are equipped with Next Generation Digital Loop Carrier (NGDLC) technology?

- b. What percentage of BellSouth's Remote Terminals in Tennessee are equipped with DSLAMs?
- c. For the categories of Remote Terminals described in subparagraphs (a) and (b) immediately above, identify the manufacturer and the model number of each type of NGDLC terminal or DSLAM currently in use in Tennessee.

ANSWER:

INTERROGATORY No. 84: Identify the person most knowledgeable about the information requested by the immediately preceding Interrogatory.

ANSWER:

INTERROGATORY No. 85: What percentage of Tennessee access lines are served, in whole or in part, by DLC?

ANSWER:

INTERROGATORY No. 86: What is the total number of loops in Tennessee over which BellSouth currently provides Digital Subscriber Line (DSL) service of any kind or variety? In answering this question, please segregate your answer by Industrial/Consumer ADSL service on the one hand, and Business service ADSL on the other.

ANSWER:

INTERROGATORY No. 87: How many BellSouth FastAccess Internet Service customers are served through Digital Subscriber Line Access Multiplexers (DSLAMs) deployed in BellSouth Remote Terminals in Tennessee?

ANSWER:

INTERROGATORY No. 88: How many customers in Tennessee does BellSouth provide with Digital Subscriber Line (DSL) service of any kind or variety via NGDLC terminals deployed in Remote Terminals?

ANSWER:

INTERROGATORY No. 89: How many Tennessee customers does BellSouth currently provide with DSL service of any kind or variety over a non-line shared loop?

ANSWER:

INTERROGATORY No. 90: In correspondence dated September 6, 2001, from Lynn R. Holmes, BellSouth Vice President for Regulatory and External Affairs, to Commissioner David L. Burgess of the Georgia Public Service Commission, BellSouth states that

[i]n certain instances . . . copper facilities that have been made spare because the working service has been "thrown" to DLC may not appear in LFACS in the terminal serving the end user because the facilities cannot be used to provide service without engineering and construction work."

Each of the following questions is related to this statement:

- a. What criteria are used by BellSouth to determine when to deploy DLC from a Central Office to a Tennessee Remote Terminal?
- b. Identify the person or persons who apply the criteria described in response to subparagraph (a) immediately above, in making the decision to deploy DLC from a Central Office to a Tennessee Remote Terminal.
- c. What economic or other criteria are used by BellSouth to determine whether to remove from service (by abandonment or by physical removal) the copper that previously served a Tennessee Remote Terminal to which DLC has been run or, alternately, to leave the pre-existing copper in service together with the DLC?
- d. Identify the person or persons responsible for making the decision as to whether to remove the pre-existing copper from service in Tennessee under the circumstances described in the immediately preceding subparagraph (c), by using the criteria described in that same subparagraph.
- e. If BellSouth retires from service copper serving a Tennessee Remote Terminal following deployment of DLC to that Remote Terminal, what does BellSouth do with the copper? Include in your answer a description of the circumstances under which that copper would be physically removed from the ground or the methods and procedures by which BellSouth would make that copper otherwise unusable by Tennessee CLECs for data transmission.
- g. In Tennessee, has BellSouth ever removed copper serving a Remote Terminal from its LFACS database following deployment of DLC to that terminal where that copper has not been rendered unusable by a process or processes described in response to the immediately preceding subparagraph (e)?

ANSWER:

INTERROGATORY No. 91: In correspondence from Ernest L. Bush, BellSouth Vice President for Long Distance Entry, to Catherine F. Boone of Covad dated March 22, 2002, BellSouth states that in attempting to provision fifty Covad orders of the BellSouth UCL-ND loop offering, BellSouth followed its procedures and provisioned properly only twenty-three of the fifty. BellSouth further states that in response to these problems BellSouth has modified "the process and documented procedures" for provisioning this loop and that all of the personnel involved in attempting to provision these orders "have been trained on the new procedures." Each of the following questions is related to the contents of this correspondence:

- a. Describe in detail the steps you are taking or have taken, if any, to increase the percentage of Tennessee UCL-ND loops that you provision properly on or before the due-date for loop delivery to Covad or another CLEC.
- b. When will the percentage of Tennessee UCL-ND loops that you provision properly on or before the due-date be equal to or better than the percentage of xDSL loops (taking an average of the percentages associated with all such loop types excluding the UCL-ND loop) that you provision properly on or before the due-date?

ANSWER:

INTERROGATORY No. 92: Attachment 2, paragraph 2.1.17.9.3 of the Interconnection Agreement between Covad and BellSouth states, in part:

Where a technician is dispatched to provision a loop, the BellSouth technician shall tag a circuit for identification purposes. Where a technician is not dispatched by BellSouth, BellSouth will provide sufficient information to Covad to enable Covad to locate the circuit being provisioned.

The following questions all relate to this Interconnection Agreement extract:

- a. For UCL-ND orders placed by Covad to serve Tennessee customers, describe in detail the steps that BellSouth takes to “provide sufficient information to Covad to enable Covad to locate the circuit being provisioned.”
- b. For UCL-ND orders placed by Covad to serve Tennessee customers, if, for whatever reason or under whatever circumstances, BellSouth fails to “provide sufficient information to Covad to enable Covad to locate the circuit being provisioned,” describe in detail the steps that Covad should take to gain access to such information.

ANSWER:

INTERROGATORY No. 93: For both line shared and stand-alone loops ordered by Covad to serve Tennessee customers, describe in detail the steps that BellSouth takes before informing Covad of a completed loop order to verify that a loop does not contain load coils.

ANSWER:

INTERROGATORY No. 94: For a Line Sharing order placed by Covad to serve Tennessee consumers, BellSouth generates two orders: (1) a “C” (change) order on the CRIS account to order the physical work to be completed in the Central Office to provision the line shared

loop, and (2) an "R" (record) order to CABS in order to generate the appropriate bills to Covad for the loop. Explain in detail all steps that BellSouth takes to ensure the "C" (change) order has been completed and the loop delivered before Covad begins to be billed for the loop.

ANSWER:

INTERROGATORY No. 95: For a Line Sharing disconnect order placed by Covad, explain in detail all steps that BellSouth takes to ensure billing for the line shared loop ceases upon disconnection, and not at some time after disconnection.

ANSWER:

INTERROGATORY No. 96: On what date will BellSouth provide mechanization of the ordering process for the Unbundled Copper Loop — Non-designed (UCL-ND)?

ANSWER:

INTERROGATORY No. 97: Describe in detail any and all databases which BellSouth uses or has access to for the purpose of qualifying loops for DSL service to Tennessee customers.

ANSWER:

INTERROGATORY No. 98: Describe in detail any and all databases which BellSouth uses or has access to for the purpose of qualifying more than one potential customer at a time for DSL service.

ANSWER:

INTERROGATORY No. 99: Describe in detail any and all bulk qualification tools available to BellSouth or its network service providers for use in evaluating whether or not a group of Tennessee customers would qualify for DSL service if they placed an order for such service. For purposes of this Interrogatory and those that follow, a "bulk qualification tool" is any method for determining, before an order is placed and with a process that does not have to be done individually for each potential customer, whether or not ten or more potential DSL customers would qualify for DSL service if they placed an order for such service.

ANSWER:

INTERROGATORY No. 100: For any bulk qualification tool identified in response to the immediately preceding Interrogatory, identify whether or not that tool is available for the use of Tennessee CLECs.

ANSWER:

INTERROGATORY No. 101: Describe in detail the bulk qualification tools that BellSouth makes available to Tennessee CLECs.

ANSWER:

INTERROGATORY No. 102: On what date will BellSouth provide full mechanization of the ordering process for the IDSL/UDC loop?

ANSWER:

INTERROGATORY No. 103: Can BellSouth retail operations order the conditioning (load coil removal and/or bridged tap removal) of a loop via an electronic interface?

ANSWER:

INTERROGATORY No. 104: On what date will BellSouth provide CLECs with the ability to pre-authorize the conditioning (load coil removal and/or bridged tap removal) of line shared and second-line loop as part of the ordering process?

ANSWER:

INTERROGATORY No. 105: Describe every marketing or sales program in effect in Tennessee as of May 1, 2002 in which BellSouth or a BellSouth affiliate offers a non-

INTERROGATORY No. 101: Describe in detail the bulk qualification tools that BellSouth makes available to Tennessee CLECs.

ANSWER:

INTERROGATORY No. 102: On what date will BellSouth provide full mechanization of the ordering process for the IDSL/UDC loop?

ANSWER:

INTERROGATORY No. 103: Can BellSouth retail operations order the conditioning (load coil removal and/or bridged tap removal) of a loop via an electronic interface?

ANSWER:

INTERROGATORY No. 104: On what date will BellSouth provide CLECs with the ability to pre-authorize the conditioning (load coil removal and/or bridged tap removal) of line shared and second-line loop as part of the ordering process?

ANSWER:

INTERROGATORY No. 105: Describe every marketing or sales program in effect in Tennessee as of May 1, 2002 in which BellSouth or a BellSouth affiliate offers a non-

regulated service or product which is linked to, or bundled with, the purchase of a regulated telecommunications service. This question is intended to include, but not be limited to, offerings in which:

- a. the purchaser of a regulated service is entitled to obtain a non-regulated service or product at a cheaper price than would otherwise be available to the purchaser.
- b. the purchaser of a non-regulated service or product is entitled to obtain a regulated service at a cheaper price than would otherwise be available to the purchaser.
- c. the purchaser of a regulated service receives any item of value other than as described in BellSouth's tariffs.

ANSWER:

INTERROGATORY No. 106: List all charitable contributions, including the name of the donee and the amount given, made by BellSouth or a BellSouth affiliate in Tennessee for the past twelve months.

ANSWER:

INTERROGATORY No. 107: From the list provided in response to Interrogatory No. 126, indicate which, if any, of the donees are not customers of BellSouth.

ANSWER:

INTERROGATORY No. 108: In the past twelve months, has BellSouth or a BellSouth affiliate ever given, or offered to give, a charitable contribution upon the condition or with the understanding, explicit or implicit, that the recipient would purchase regulated telecommunications services from BellSouth? If so, please describe each such gift or offer.

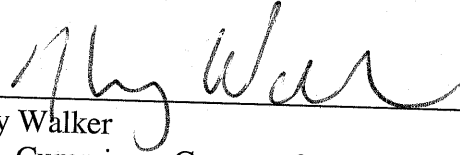
ANSWER:

REQUEST FOR DOCUMENTS

1. Please provide any and all documents related to and relied upon in responding to CLEC Interrogatories to BellSouth.
2. Produce copies of all documents that relate to the performance of LCSC operations, including but not limited to, "LCSC Weekly Operations Reports," "LCSC Daily Reports", or similarly captioned reports from October 2001 to present.
3. Please produce all training materials and procedure manuals/documents provided to and or used by LCSC service representatives.
4. Produce copies of all documents that relate to BellSouth's current internal change control processes for its own internal OSS and for the CLEC OSS.
5. Produce copies of the minutes and notes taken by all participants in meetings of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of change requests under the Change Control Process Document. This should include but not be limited to the groups known as the "Triage Committee", the "Change Review Board", the "Directors Committee", the "Release Prioritization Team", the "Third Party Testing Team", the "Regulatory Team" the LCSC Team", the Project Managers", the Bellsouth IT Team", and "BTST", from October 2001 to the present.
6. Produce copies of "Master Prioritization List" and "NCS Integrated Lists" produced and used by the groups listed in Request for Documents No. 5 above from October 2001 to the present.
7. Produce copies of all documents associated with all "Force Models" used to project and administer staffing of the LCSC, CWINS and associated centers during 2000, 2001, 2002, and 2003.
8. Produce copies of all documents associated with the use of CAVE by CLECS and vendors related to the implementation of Release 10.5.
9. Produce copies of all documents associated with the internal testing of Release 10.5 conducted by BellSouth.
10. Since October 2001, produce any document that compares or analyzes BellSouth's internal performance data to evaluate the extent to which BellSouth's actual performance results for OSS functions (pre-ordering, ordering, provisioning, maintenance & repair, and billing) are similar in each state of its nine state region.

11. Produce a copy of the Account Team/CLEC Care Team procedures described in Observation 170 of the Florida Third Party Test.
12. Produce a copy of the Performance Measurements Analysis Platform (PMAP) Procedures described in Observation 170 of the Florida Third Party Test.
13. Please produce all documents relating to the group or department that reviews work performed by the LCSC representatives to ensure the accuracy of the issued order based on the information submitted by the CLEC in the LSR. Include documents relating to its methods, procedures and work papers.
14. Please produce all documents that relate to BellSouth's attempts to increase the capacity and/or stability of its OSS production systems.
15. Produce copies of all documents related to (a) the development of BellSouth's plans to replace existing OSS with different OSS solutions: (b) its decision(s) whether and when to implement such plans.
16. Produce copies of each version of BellSouth plans to replace any of its existing OSS with any different OSS solutions since October 2001.
17. Produce copies of all documents and materials (whether paper, electronic or any other form) prepared or received by BellSouth since January 1, 2000 that describe or discuss any complaints by CLECs concerning BellSouth's win back programs or practices.
18. Produce copies of BellSouth's Methods and Procedures regarding the tracking and inventorying of CLEC circuit facility assignments
19. Provide copies of all previous versions of User Requirements Document ENC21046.DOC Version 6.0), and copies of all internal communications and supporting documents prepared and used by all BellSouth employees and vendors during the preparation of the User Requirements and Change Request CR0756

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Henry Walker", is written over a horizontal line.

Henry Walker
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Nashville, Tennessee 37219
(615) 252-2363

Counsel for the Southeastern Competitive
Carriers Association, XO Tennessee, Inc., DIECA d/b/a
Covad Communications Company ("Covad")

And

AT&T Communications of the South Central States, LLC

And

WorldCom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 23rd day of May, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300



Henry Walker